To: diplicd@monroe.wednet.edu[diplicd@monroe.wednet.edu]
From: Mullin, Michelle
Sent: Wed 1/27/2016 1:32:32 AM
Subject: Light ballast clean-up

Hi Devlin-

Thank you for your call today regarding how to clean up PCB Light Ballast leaks.

Firstly- I want to point out that the leaks in question, since they are older than 48 hours, should be remediated in accordance with 40 CFR 761.79 or 761.61. The full text of PCB regulations can be found at this link: http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=60ad06684d4f01c162b4ac6d39ba0315&mc=true&n=pt40.31.761&r=PART&ty=H

The Self-Implementing options for cleanup do not apply to the floor, but may apply to the desk and/or other moveable equipment identified as affected by leaks. If you follow the self-implementing procedure, you must follow the regulations stated in 761.79(c)(2).

That paragraph states:

(2) Any person decontaminating movable equipment contaminated by PCBs, tools, and sampling equipment may do so by:

(i) Swabbing surfaces that have contacted PCBs with a solvent;

(ii) A double wash/rinse as defined in subpart S of this part; or

(iii) Another applicable decontamination procedure in this section

If you are not using the self-implementing procedures, you must follow the performance based measures, or apply for alternate decontamination approval from EPA. Under the performance based options found at 761.79(b), the regulations do not stipulate the allowable solvents, only that it must be cleaned to meet a decontamination standard. Additional performance requirements of the solvent are given in paragraph (d). We do not have guidance for solvents that can be used, other than the performance standards in the regulations in paragraph (d). This is an excerpt:

the solubility of PCBs in any solvent used for purposes of decontamination under this section must be 5 percent or more by weight.

We have had sites propose to use alternative, aqueous based solvents, such as 10 percent CAPSUR/water mixture. If you would like to pursue a solvent other than defined in paragraph (d), and demonstrate its performance through sampling, you will need to apply for approval under 761.79(h).

The Decontamination Standards at 761.79(b)(3) state:

(3) The decontamination standard for non-porous surfaces in contact with liquid and non-liquid PCBs is:

(i) For unrestricted use:

(A) For non-porous surfaces previously in contact with liquid PCBs at any concentration, where no free-flowing liquids are currently present, ≤10 micrograms PCBs per 100 square centimeters (≤10 µg/100 cm^2) as measured by a standard wipe test (§761.123) at locations selected in accordance with subpart P of this part.

Although self-implementing procedures do not require sampling for compliance, if you choose a self-implementing method I strongly recommend confirmation sampling to ensure cleanup is complete.

Other helpful links:

Double Wash/Rinse section in the Regulations (40 CFR 761 Subpart S) http://www.ecfr.gov/cgi-bin/retrieveECFR?gp=&SID=60ad06684d4f01c162b4ac6d39ba0315&mc=true&n=pt40.31.761&r=PART&ty=H

Double Wash Rinse and taking a wipe sample guidance document:
http://www3.epa.gov/epawaste/hazard/tsd/pcbs/pubs/wipe-samp.pdf

Guidance document on PCB-containing fluorescent Light ballasts in school buildings, for building managers and maintenance personnel:
http://www3.epa.gov/epawaste/hazard/tsd/pcbs/pubs/ballasts.htm

Please let me know if I can be of further assistance.

Sincerely,

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